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LNGS | LUKAS,
NACE,
GUTIERREZ
& SACHS, LLP

October 24, 2013

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A306
Washington, DC 20554

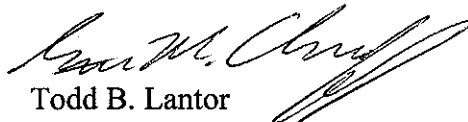
Re: Connect America Fund, WC Docket No. 10-90

Dear Secretary Dortch:

On behalf of DialTone Services, LP ("DialTone"), SAC 449030, please find attached DialTone's FCC Form 481 Carrier Annual Report, filed pursuant to Section 54.313 of the Commission's Rules ("Form 481 Report"). The Form 481 Report has been submitted to the Universal Service Administrative Company through its E-File System, and was successfully certified on October 10, 2013.

Please contact the undersigned at 703-584-8670 if any questions arise concerning the above-referenced enclosures or if you require any additional information.

Sincerely,


Todd B. Lantor
Steven M. Chernoff

Attorneys for:
DialTone Services, LP

Attachment

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0419
 July 2013

<010> Study Area Code	449030
<015> Study Area Name	DIALTONE SERVICES, LP
<020> Program Year	2014
<030> Contact Name: Person USAC should contact with questions about this data	William Dorran
<035> Contact Telephone Number: Number of the person identified in data line <030>	(415) 505-8127
<039> Contact Email Address: Email of the person identified in data line <030>	bdorran@dialtonetexas.com

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report			
<300> Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330> Detail on Attempts (broadband)	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed	0.0		
<420> Mobile	0.0		
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440> Fixed			
<450> Mobile			
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> 449030TX510	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> 449030TX610	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)? <input checked="" type="radio"/> <input checked="" type="radio"/>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000> Voice Services Rate Comparability	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010> <input checked="" type="radio"/> <input checked="" type="radio"/>	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1100> Terrestrial Backhaul (Y/N)? <input checked="" type="radio"/> <input checked="" type="radio"/>	(if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input checked="" type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>

**(100) Service Quality Improvement Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	449030
<015>	Study Area Name	DIALTONE SERVICES, LP
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	William Dorran
<035>	Contact Telephone Number - Number of person identified in data line <030>	(415) 505-8127
<039>	Contact Email Address - Email Address of person identified in data line <030>	bdorran@dialtonetexas.com
<110>	Has your company received its ETC certification from the FCC?	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

- <112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

 Name of Attached Document (.pdf)

Please check these boxes below to confirm that the attached PDF, on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
 <114> Report how much universal service (USF) support was received
 <115> How (USF) was used to improve service quality
 <116> How (USF) was used to improve service coverage
 <117> How (USF) was used to improve service capacity
 <118> Provide an explanation of network improvement targets not met in the prior calendar year.

<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>

(200) Service Outage Reporting (Voice)
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	449030
<015>	Study Area Name	DIALTONE SERVICES, LP
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	William Dorran
<035>	Contact Telephone Number - Number of person identified in data line <030>	(415) 505-8127
<039>	Contact Email Address - Email Address of person identified in data line <030>	bdorran@dialtonetexas.com

[illegible]

(700) Price Offerings including Voice Rate Data
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	449030
<015>	Study Area Name	DIALTONE SERVICES, LP
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	William Dorran
<035>	Contact Telephone Number - Number of person identified in data line <030>	(415) 505-8127
<039>	Contact Email Address - Email Address of person identified in data line <030>	bdorran@dialtonetexas.com

<701>	Residential Local Service Charge Effective Date	1/1/2013
<702>	Single State-wide Residential Local Service Charge	

[illegible]

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	449030
<015>	Study Area Name	DIALTONE SERVICES, LP
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	William Dorran
<035>	Contact Telephone Number - Number of person identified in data line <030>	(415) 505-8127
<039>	Contact Email Address - Email Address of person identified in data line <030>	bdorran@dialtonetexas.com

<711>

[illegible]

(800) Operating Companies Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	449030
<015>	Study Area Name	DIALTONE SERVICES, LP
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	William Dorrان
<035>	Contact Telephone Number - Number of person identified in data line <030>	(415) 505-8127
<039>	Contact Email Address - Email Address of person identified in data line <030>	bdorrان@dialtonetexas.com
<810>	Reporting Carrier	DIALTONE SERVICES, LP
<811>	Holding Company	
<812>	Operating Company	

[illegible]

**(900) Tribal Lands Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	449030
<015>	Study Area Name	DIALTONE SERVICES, LP
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	William Dorran
<035>	Contact Telephone Number - Number of person identified in data line <030>	(415) 505-8127
<039>	Contact Email Address - Email Address of person identified in data line <030>	bdorran@dialtonetexas.com

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document (.pdf)

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions;
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select (Yes, No, NA)

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	449030
<015>	Study Area Name	DIALTONE SERVICES, LP
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	William Dorran
<035>	Contact Telephone Number - Number of person identified in data line <030>	(415) 505-8127
<039>	Contact Email Address - Email Address of person identified in data line <030>	bdorran@dialtonetexas.com

Please check this box to confirm no terrestrial backhaul
<1120> options exist within the supported area pursuant to § 54.313(G) ☐

Please check this box to confirm the reporting carrier offers
<1130> broadband service of at least 1 Mbps downstream and 256 kbps
upstream within the supported area pursuant to § 54.313(G) ☐

(1200) Terms and Condition for Lifeline Customers**Lifeline****Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	449030
<015>	Study Area Name	DIALTONE SERVICES, LP
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	William Dorran
<035>	Contact Telephone Number - Number of person identified in data line <030>	(415) 505-8127
<039>	Contact Email Address - Email Address of person identified in data line <030>	bdorran@dialtonetexas.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

449030TX1210

Name of attached document (.pdf)

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached PDF, on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒
- <1222> Details on the number of minutes provided as part of the plan, ☒
- <1223> Additional charges for toll calls, and rates for each such plan. ☒

(2000) Price Cap Carrier Additional Documentation**Data Collection Form***Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	449030
<015>	Study Area Name	DIALTONE SERVICES, LP
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	William Dorran
<035>	Contact Telephone Number - Number of person identified in data line <030>	(415) 505-8127
<039>	Contact Email Address - Email Address of person identified in data line <030>	bdorran@dialtonetexas.com

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<2010> 2nd Year Certification {47 CFR § 54.313(b)(1)}
 <2011> 3rd Year Certification {47 CFR § 54.313(b)(2)}

☐
☐
Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}

<2012> 2013 Frozen Support Certification
 <2013> 2014 Frozen Support Certification
 <2014> 2015 Frozen Support Certification
 <2015> 2016 and future Frozen Support Certification

☐
☐
☐
☐
Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification Support Used to Build Broadband

☐
Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017> 3rd year Broadband Service Certification
 <2018> 5th year Broadband Service Certification
 <2019> Interim Progress Certification
 <2020> Please check the box to confirm that the attached PDF, on line 2021, contains the required information pursuant to § 54.313 (e)(3)(iii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

☐
☐
☐
☐

<2021> Interim Progress Community Anchor Institutions

Name of Attached Document Listing Required Information

<010>	Study Area Code	449030
<015>	Study Area Name	DIALTONE SERVICES, LP
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	William Dorran
<035>	Contact Telephone Number - Number of person identified in data line <030>	(415) 505-8127
<039>	Contact Email Address - Email Address of person identified in data line <030>	bdorran@dialtoneutexas.com

Progress Report on 5 Year Plan

- 10/10/2013

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010>	Study Area Code	449030
<015>	Study Area Name	DIALTONE SERVICES, LP
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	William Dorran
<035>	Contact Telephone Number - Number of person identified in data line <030>	(415) 505-8127
<039>	Contact Email Address - Email Address of person identified in data line <030>	bdorran@dialtonetexas.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	DIALTONE SERVICES, LP
Signature of Authorized Officer:	CERTIFIED ONLINE
	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	449030
Filing Due Date for this form:	10/15/2013
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	449030
<015> Study Area Name	DIALTONE SERVICES, LP
<020> Program Year	2014
<030> Contact Name - Person USAC should contact regarding this data	William Dorran
<035> Contact Telephone Number - Number of person identified in data line <030>	(415) 505-8127
<039> Contact Email Address - Email Address of person identified in data line <030>	bdorran@dialtonetexas.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: DIALTONE SERVICES, LP	
Signature of Authorized Officer: CERTIFIED ONLINE	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: 449030	Filing Due Date for this form: 10/15/2013
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: DIALTONE SERVICES, LP	
Name of Authorized Agent or Employee of Agent: Lukas, Nace, Gutierrez & Sachs, LLP	
Signature of Authorized Agent or Employee of Agent: CERTIFIED ONLINE	Date: _____
Printed name of Authorized Agent or Employee of Agent: Steven M. Chernoff	
Title or position of Authorized Agent or Employee of Agent: Attorney	
Telephone number of Authorized Agent or Employee of Agent: (703) 584-8670	
Study Area Code of Reporting Carrier: 449030	Filing Due Date for this form: 10/15/2013
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

Line 510 – Compliance with Service Quality Standards and Consumer Protection

The FCC's rules require that an ETC provide a "[c]ertification that it is complying with applicable service quality standards and consumer protection rules[.]"¹ For wireless ETCs, the FCC has held that a commitment to abide by the CTIA–The Wireless Association® ("CTIA") Consumer Code for Wireless Service is sufficient to meet this requirement.² The FCC has also determined that it will evaluate other commitments on a case-by-case basis, noting that "[t]o the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement."³ Finally, the FCC has held that "[i]f ETCs are complying with any voluntary code ... they should so indicate in their reports."

DialTone Services, L.P. ("DTS") hereby certifies that it complies with applicable service quality and consumer protection practices in connection with its provision of voice services. Specifically, in the orders designating DTS as an ETC, the Public Utility Commission of Texas ("PUC") accepted DTS's voluntary commitment to comply with several PUC Substantive Rules related to quality of service, service objectives and transmission requirements, to the extent those rules are applicable to MSS providers. *See* P.U.C. Subst. R. 26.52, 26.53, and 26.54. DTS also complies with applicable federal service quality and consumer protection requirements, including but not limited to Customer Proprietary Network Information rules and other federal rules and statutes protecting consumer privacy.

¹ 47 C.F.R. § 54.313(a)(5).

² *Federal-State Joint Board on Universal Service, Report and Order*, 20 FCC Rcd 6371, 6383 (2005).

³ *Id.* at 6383-84 and n.72.

Line 610 – Functionality in Emergency Situations

Section 54.313(a)(6) requires eligible telecommunications carriers (“ETCs”) to certify that they are “able to function in emergency situations as set forth in §54.202(a)(2)”¹ in connection with their provision of voice services. The Commission’s Rules do not require an ETC to describe how it is capable of handling emergencies. The referenced rule section, Section 54.202(a)(2), requires that each applicant for ETC designation must “[d]emonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to re-route traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”² Although DialTone Services, L.P. (“DTS”) is not an applicant, it will rely on Section 54.202(a)(2) to describe its network’s emergency functionality for purposes of Section 54.313(a)(6) as follows:

DTS utilizes Mobile Satellite Service (“MSS”) networks to provide service. By its nature the network is designed to operate in an emergency setting. The ground units can operate on either traditional power or their battery power. The satellites are powered by solar power and batteries and not subject to power outages on the ground. The network operating center or hub on the ground has backup power generation. The networks are also designed to handle increases in traffic with both existing excess capacity and the ability to increase power to increase capacity. DTS has provided service to first responders in emergency situations in Texas on several occasions where DTS was the only functioning network.

¹ 47 C.F.R. § 54.313(a)(6).

² 47 C.F.R. § 54.202(a).

DialTone Services, L.P. (SAC 449030)

Line 1200 – Terms and Conditions for Lifeline Customers

Monthly rate: \$14.95

Minutes: 300 included

Toll charges: None